



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

NOV 28 2009

Neil Reiff, Esq.  
Sandler, Reiff, and Young, P.C.  
300 M Street, S.E. Suite 1102  
Washington, DC 20003

RE: MUR 6192  
Lakin Law Firm P.C.

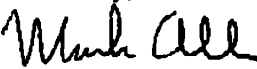
Dear Mr. Reiff:

On May 14, 2009, the Federal Election Commission notified your client, Lakin Law Firm P.C., of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

Upon further review of the allegations contained in the complaint, and the information provided by your client, on November 13, 2009, the Commission found that there is no reason to believe that Lakin Law Firm, P.C. violated 2 U.S.C. §§ 441a(a) or 441b(a). Accordingly, on November 13, 2009, the Commission closed the file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003). The Factual and Legal Analysis, which more fully explains the Commission's decision, is enclosed for your information.

If you have any questions, please contact Shana M. Broussard, the attorney assigned to this matter at (202) 694-1650.

Sincerely,  
  
Mark Allen  
Assistant General Counsel

Enclosure  
Factual and Legal Analysis

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1 **FEDERAL ELECTION COMMISSION**

2 **FACTUAL AND LEGAL ANALYSIS**

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5 **RESPONDENT:** Lakin Law Firm, P.C. **MUR 6192**

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8 **I. GENERATION OF MATTER**

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10 This matter was generated by a Complaint filed with the Federal Election  
11 Commission ("the Commission") by Stephen Jellen. *See* 2 U.S.C. § 437g(a)(1).

12 **II. FACTUAL AND LEGAL ANALYSIS**

13 The Complaint alleges that Lakin Law Firm P.C. ("LLF") made excessive and  
14 possibly prohibited corporate contributions to the Madison County Democratic Central  
15 Committee ("MCDCC" or "the Committee"), a local party committee of the Illinois  
16 Democratic Party, in violation of the Federal Election Campaign Act of 1971, as  
17 amended ("the Act"). LLF acknowledges that it made two monetary contributions and an  
18 in-kind contribution to MCDCC, totaling \$10,594. LLF Response at 2. LLF contends  
19 that its contributions were intended for non-federal activities, *see* LLF Response at 2, and  
20 the available information does not suggest otherwise. *See* 2 U.S.C. § 431(8)(A) (the Act  
21 defines "contribution" to include "anything of value made by any person for the purpose  
22 of influencing any election for Federal office"). Based upon the available information,  
23 MCDCC did not meet any of the Act's thresholds for political committee status and thus  
24 the Committee is not subject to the Act's limitations and prohibitions on contributions  
25 received. Accordingly, the contributions made by LLF do not appear to be subject to the  
26 Act's limits and prohibitions.<sup>1</sup> Because the available information does not indicate that

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<sup>1</sup> Illinois statute 10 ILCS 5/9-1 et. seq. (2008) permits candidates for state and local office to raise money from individuals, partnerships, and corporations without limits or restrictions on the amounts of such contributions.

- 1   LLF made excessive or corporate contributions, the Commission finds no reason to
- 2   believe that the Lakin Law Firm, P.C. violated 2 U.S.C. §§ 441a(a) or 441b(a).

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